

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Telecommunications Relay Services) CG Docket No. 03-123
And Speech-To-Speech Services)
For Individuals With)
Hearing And Speech Disabilities)

The undersigned hereby petition the Federal Communications Commission (FCC) to extend the minimum time that a communications assistant answering and placing a speech-to-speech (STS) relay call must stay with that call to twenty (20) minutes. This would extend the current minimum of fifteen (15) minutes by an additional five (5) minutes. The undersigned submit the following arguments in support of this petition.

On March 6, 2000 the FCC released a report and order requiring CAs that handle STS calls to remain on those calls for a minimum of fifteen (15) minutes before transferring these calls to other CAs. Although at the same time, the FCC also required CAs handling other types of relay calls to remain with those calls for a shorter period of time – namely ten (10) minutes – the Commission explained that a longer minimum for STS calls was necessary because of the disruption that can occur when CAs are changed. Specifically, the FCC explained:

Commenters point out that, during the initial stages of a call, there is a “settling-in” time wherein the caller and the CA get accustomed to each other. During this time, callers with speech disabilities develop greater assurance that the CA will understand them. Rotation of a CA during an STS call disrupts this assurance, and may even cause the user to speak less clearly. For these reasons, we find that STS CAs must stay with a call for at least fifteen minutes.¹

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, CC Dkt. 98-67, FCC 00-56, 15 FCC Red 5140 (March 6, 2000), ¶70 (footnotes omitted).

The undersigned agree with the FCC's reasoning, but for the following reasons, maintains that given the nature of STS calls, a full twenty minutes is needed before any call transfers should be permitted:

Enormous Concentration Time Required. It takes enormous concentration and a greater amount of time for many persons with speech disabilities (PSDs), in contrast to people without speech disabilities, to perform the following tasks, all at the same time:

- Begin speaking
- Think and form a response, and
- Listen with intent to the other party.

The interruption that is caused by a change of CAs disrupts the PSD's concentration on each of these activities. For example, one STS user reported, "Sometimes I am so flustered by that interruption that I forget what I am going to say." Other STS users have reported the same concern.

Initial Time Needed to Maximize Understanding. It generally takes a few minutes for a CA to begin to maximize his or her understanding of the speech patterns of a particular PSD. Once this understanding is maximized, the speed of the conversation can increase. Unfortunately, when agents change, this process must begin all over again, and the exchange of information during the conversation is again delayed.

Spelling of Names and Technical Terms. CAs often have trouble understanding people's names and unusual technical words spoken by the PSD. This results in the PSDs being required to spell out these words. After a change of CAs, the PSD must repeat this entire process again. This results in slowing down the conversation considerably.

Fluidity of the Call. Reducing the frequency of CA changes increases the fluidity of the call. The result is the call becomes more functionally equivalent to a call between two non-speech disabled callers.

Save Relay Funds. Reducing the frequency of CA changes will also save relay costs because calls will be processed more efficiently, without the need to ask the PSDs to unnecessarily repeat words and phrases.

In determining appropriate time limits for CAs to remain on calls, the FCC took into consideration the average length of these calls. For example, the Commission explained that a ten minute rule made sense for traditional TRS calls because most of these calls lasted for less than ten minutes

anyway.² Given their nature, however, STS calls often last much longer than text-to-voice calls; changing CAs on these calls prior to twenty minutes can seriously disrupt their flow and impair functionally equivalent telephone service. Accordingly, the CAC requests that the FCC extend the time that a CA must remain on an STS call to 20 minutes.

We further request that the FCC specify the twenty minute period to begin when effective communication begins. Effective communication is achieved when the CA is able to relay the communications between the parties accurately and impartially, and interpret for the PSD both receptively and expressively, using any necessary specialized vocabulary. Whether or not effective communication has been achieved should be determined on a case-by-case basis. What this means is that although the CA may generally be qualified to handle STS calls in most situations, he/she may come upon a call that requires specific skills that he/she does not have; in this case, he/she will not be qualified to provide effective communication and an alternate CA must be obtained. The period of time allowed before an STS call can be transferred to another CA should begin only after the new CA is secured, and twenty minutes after the caller is able to achieve effective communication with that new CA.

Respectfully submitted,

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² Id. at ¶69.

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